

Schedule

Fire Prevention Plan (FPP).

1. Outline in detail how the FPP will be tested annually and demonstrate the training exercises meets the requirements Section 5 of our FPP guidance. This must address the following:

- what the training will cover
- how often it will happen.
- what staff need to do to prevent a fire occurring;
- what to do during a fire if one breaks out;
- Site specific requirements.
- How you will fully test your fire prevention plan – they will normally need to be more than a simple fire evacuation drill.
- Procedures for review and revision of the FPP

Section 2.2 of your FPP addresses testing of the plan and staff training with sub-section 2.2.2 outlining what the test will include.

You must demonstrate that the contents of this test will meet all the specific requirements of an annual test as outlined in Section 5 of our guidance.

Section 2 has been updated to include frequency of training/ refresher training and the training needs assessment has been updated in Appendix 1 to include the Fire evacuation procedure along with training in Sections 4, 5 and 6 of the FPP. Contractors are informed of FPP as part of induction. Most contractors on site will operate under the permit to work system.

2. In relation to inspections and certification of electrical equipment and installations:

(a) Confirm that “Fireline” are a suitably qualified and certified company to carry out electrical work;

Fireline are accredited to BAFE SP101, are members of the UK Fire Association, are members of the British Fire Consortium and ISO9001.

[Fireline UK | Fire Protection and Maintenance | ISO 9001 \(fire-extinguisher-maintenance.co.uk\)](http://fireline-uk.co.uk)

(b) Outline the content of the Electrical Maintenance Schedule “visual inspection” to be carried every six months on the biomass building, materials recovery facility (MRF) and other site areas.

Appendix 4 (Electrical Maintenance Schedule) notes that “Fireline” carry out emergency lighting inspections and portable appliance testing. There is no evidence provided that they are accredited and certified to carry out this work.

The Electrical Maintenance Schedule proforma notes that a “visual inspection” is carried out on the biomass building, materials recovery facility (MRF) and other areas of site every six months. There is no indication given as to the scope of visual inspections with regard to electrical maintenance.

Electrical inspections along with all inspections have a visual element. The staff carrying out the visual assessments work for TG Electrical Services who are a NICEIC Approved Contractor and whose staff are competent and qualified to comply with BS7671 (Requirements for Electrical Installations. IET Wiring Regulations, which is the UK’s main electrical safety standard).

3. In relation to moisture testing of wood on site:

(a) Confirm if moisture testing is carried out on wood stockpiles prior to their transfer to the biomass plant or only on wood prior to its transfer off-site.

Moisture checks are carried out primarily as a function of compliance with BSL product specification not as a sole means of detecting elevated temperature rises in wood stockpiles, although there would be some correlation between temperature rise and moisture content. This therefore takes place on wood prior to transfer off site. A new procedure for checking temperatures using either the thermal imaging camera or handheld infra-red thermometer (in the absence of the thermal imaging camera) has been included in Section 5.7 of the FPP.

(b) Outline the method for testing moisture on wood and the turnaround time for results.

Moisture checks are carried out using a handheld moisture meter with a 1 metre insertion probe. The probe is inserted into several locations on the stockpile. The results are instantaneous and are displayed on the moisture meter. The meter also logs the readings so that they can be downloaded.

(c) Outline and justify the trigger moisture level which you would regard as indicating an increase in temperature of the wood that requires further investigation or action.

Temperature monitoring is proposed as the main source of method for the detection of potential issues. The trigger level used is 50^oc as mentioned in Section 5.7 of the FPP. This value is based on EA Guidance document and also Wood Recyclers Association guidance document.

(d) Outline and justify the further investigation or action to be taken should moisture trigger levels indicate an increase in temperature.

Temperature monitoring is proposed as the main source of method for the detection of potential issues. The trigger level used is 50°C as mentioned in Section 5.7 of the FPP. This value is based on EA Guidance document and also Wood Recyclers Association guidance document.

The 4W Environmental Limited document responding to each FPP item in the Schedule 5 Notice issued on 9th December 2020 stated, in response to question 9(b) that “Moisture checks carried out daily. If there was a sudden reduction in moisture this would occur at the same time as an increase in temperature”.

The references in the FPP to carrying out moisture checks on wood relate predominately to the use of this technique to confirm the wood meets the moisture ranges required for product specification purposes rather than using this as an alternative measure of detecting a temperature rise in the wood piles (e.g., sections 3.2.28(viii) and 3.2.41).

You must confirm if the use of moisture checking would be used as an alternative measure of detecting temperature rises in wood stockpiles.

4. In relation to the visual assessment of biomass stockpiles:

(a) Demonstrate how the visual assessment operates as a means of detecting signs of temperature elevation.

Temperature monitoring is proposed as the main source of method for the detection of potential issues. The trigger level used is 50°C as mentioned in Section 5.7 of the FPP. This value is based on EA Guidance document and also Wood Recyclers Association guidance document.

(b) Provide a copy of the procedure for inspecting biomass stockpiles for signs of elevated temperatures and any checklist produced from these inspections.

Temperature monitoring is proposed as the main source of method for the detection of potential issues. The trigger level used is 50°C as mentioned in Section 5.7 of the FPP. This value is based on EA Guidance document and also Wood Recyclers Association guidance document.

It is not proposed to store waste on site for more than 3 months.

Section 5.7.2 of your FPP notes that stockpiles will be visually monitored by staff for potential evidence of excessive heating such as steam, smoke, feelings of warmth. If hot spots are suspected, then the waste is removed to the quarantine area. There is access to a thermal imaging camera to use by trained staff if a hotspot is suspected.

Sufficient information has not been provided to demonstrate that this management system will manage the risk of self-combustion or auto-ignition in the absence of routine temperature monitoring which would not be required if stockpiles are not stored on site for longer than three months.

5. Provide a copy of the spillage procedure toolbox talk used to train staff

The 4W Environmental Limited document responding to each item in the Schedule 5 Notice issued on 9th December 2020 stated, in response to question 10(b) that a copy of the spillage procedure toolbox talk used to train staff was attached to the response but no such document was submitted.

Apologies, a copy of the updated spillage toolbox talk has been attached with this response.

6. In relation to the operation of the biomass boilers:

(a) Confirm the operational hours of the biomass boilers

Section 3.2.3 of the FPP states that in accordance with the approved planning permission 16/05501/MAW. The boilers are permitted to operate continuously with operations including external loading limited to 06.00 to 19.00.

(b) If biomass boilers are to be operated at periods when the site is unattended, demonstrate how their operation will be controlled to manage fire risks.

Section 3.2.3 of your FPP states that the biomass boilers will operate “continuous” although site operating hours at the biomass plant will be 09.00 – 17.00. Should biomass boilers be operated when the site is not routinely attended by staff, then you must demonstrate how fire risks are controlled during those periods.

The biomass boilers will operate whilst there are no staff present on site between the hours of 19.00 to 06.00. The walking floor feed bays will be loaded at the end of the late shift (19.00) to provide feedstock throughout the night. The fire risks are controlled through the fire detection and suppression systems in place as described in Section 10.1 of the FPP. The stockpiles will be managed through implementation of Section 6 of the FPP.

7. State the timescale for VP Fire Safety completing firefighting training for key staff.

Section 12.1.6 of your FPP states “Going forward TG Enviro are currently looking to get VP Fire Safety to come out on site and carry out firefighting training for key staff”. No timescale is set for this activity.

VP Fire Safety are booked to come on site 6th/ 7th August 2021 to carry out the fire fighting training.

8. In relation to the extent and scope of the fire watch carried out on site:

(a) Confirm that all potential sources of fire (including hot works and hot surfaces) are included in the fire watch.

The fire watch will cover all operations as deemed necessary including works requiring the use of open flames or the local application of heat or friction

(b) Confirm if any formal documentation such as a fire watch checklist is produced (and, if so, provide a copy with this response).

A fire watch implementation checklist has been produced and includes a fire watch log. A copy has been attached to this email response.

(c) Confirm the timescale for Tudor Griffiths agreeing with their insurance company the procedure for fire watch including equipment previously subject to hot works and submitting an updated FPP that includes this procedure.

The operator has confirmed that the insurance company, following on from an audit by the insurance company, raised the issue of bolstering up the hot works procedure, as an advisory. This therefore meets the requirements of the insurance company.

Section 4.7 of the FPP has been updated.

Section 4.7.6 of your FPP states that “fire watch must be provided during and for a period of 1 hour after work”. Sections 4.9.2 and 4.13.1 state respectively “The cleaning activity will also act as part of the fire watch at the end of the working day” and “This activity [cleaning mobile plant] will also act as a fire watch at the end of the working day. It is not deemed necessary to carry out a fire watch after plant and equipment have been cleaned”.

Further information is required to clarify the extent of fire watch and any cleaning period contributing to the fire watch.

The 4W Environmental Limited document responding to each item in the Schedule 5 Notice issued on 9th December 2020 stated, in response to question 5(b) that “The procedure for fire watch including equipment that has previously been subject to hot works is currently being agreed between the H&S Manager for TG Group and the insurance company. The current draft procedure has been written in to the FPP.” A timescale must be set for TG Group and the insurance company to agree the procedure for fire watch.

9. In relation to checking waste loads arriving on site:

(a) Demonstrate how the visual checks carried out on incoming wood will identify signs of heating and prevent hot loads being accepted onto site and possibly being mixed with other wastes stored on site.

A toolbox talk has been delivered to staff (copy attached). This toolbox talk informs staff about the visual checks that need to be undertaken and the possible signs of hot loads arriving on site. Temperature monitoring is proposed as the main source of method for the detection of potential issues. The trigger level used is 50^oc as mentioned in Section 5.7 of the FPP. The value is based on EA Guidance document and Wood Recyclers Association guidance document.

(b) Provide justification why the site thermal imaging camera would not be used to detect hot loads in incoming waste deliveries.

Temperature monitoring is proposed as the main source of method for the detection of potential issues. The trigger level used is 50^oc as mentioned in Section 5.7 of the FPP. The value is based on EA Guidance document and Wood Recyclers Association guidance document.

(c) Demonstrate that operational staff, including weighbridge operators, are trained and aware of how to find a hot load amongst incoming wastes.

Section 3.2.22 of your FPP states “A visual inspection of the load by CCTV camera will also be undertaken where possible by the weighbridge officer”. There is no information provided on what that visual inspection would be looking for or what circumstances would render the inspection not possible. More detail is required on how that visual inspection process will operate.

Although the training needs assessment records show that “signs of hot loads, what to look out for” are included in the training for the MRF, Inert and Biomass, it is unclear if the weighbridge operator is trained and aware of how to look out for a hot load.

The Training Matrix in Appendix 1 has been updated to include the weighbridge operator, with reference to the training required, which includes detection of hot loads.

10. In relation to management of waste on site:

(a) Demonstrate how operational procedures, the design of site, storage and handling of waste piles will operate the first in, first out policy and demonstrate good stock rotation.

References have been made throughout the FPP to the Monthly Stock Rotation Spreadsheet, in particular Section 5.2.1. This allows TG Enviro to keep a track on when stockpiles were formed, shredding activity and max storage date. This data can then be used by management when determining which stockpiles need to be processed or moved from site.

(b) Demonstrate how operational staff are trained in operating the first in, first out policy.

Training will be given to the Divisional Manager, Waste & Recycling Manager and the Biomass Supervisor upon approval of the Monthly Stock Rotation Spreadsheet.

(c) Demonstrate how operator understanding of a good first in, first out policy will allow them to know which waste stockpiles have been on site for the longest period of time and hence which stockpiles should be processed first.

References have been made throughout the FPP to the Monthly Stock Rotation Spreadsheet, in particular Section 5.2.1. This allows TG Enviro to keep a track on when stockpiles were formed, shredding activity and max storage date. This data can then be used by management when determining which stockpiles need to be processed or moved from site.

(d) Update drawing, TGE/09/A, to include the maximum pile volumes and a representative drawing of the stockpiles showing the footprints of the piles.

Drawing TGE/09/A has been updated to include maximum pile volumes. A copy has been attached with this response. The drawing shows the footprint of the stockpiles as well as the separation distances.

Section 5.2 of your FPP addresses how you "Manage storage time" and notes that by processing biomass in a timely manner, you remove the need for stockpiling and ensure that the policy of first in and first out is met. Section 5.4 of the FPP references "Stock rotation policy" and again focuses on the regular processing of stockpiles to demonstrate that the first in and first out policy is achieved.

Neither section fully clarifies how operational staff are aware which wood stockpile would be present on site for the longest period of time and which should be processed first.

Drawing, TGE/09/A, shows stockpile storage areas such as Grade A loose wood, Grade A fines and Grade A chip etc. and it is not apparent from the FPP how these stockpiles will be managed and processed to ensure good stock rotation and first in, first out policy.

11. (a) Demonstrate that fire walls and bays constructed on site are designed to meet the requirements in Section 11.2 of our guidance namely to:

- resist fire (both radiative heat and flaming);
- have a fire resistance period of at least 120 minutes to allow waste to be isolated and to enable a fire to be extinguished within 4 hours.

(b) Demonstrate how the specification, construction and dimension of the walls offer a thermal barrier.

(c) Demonstrate that if waste is stored in a bay you:

- will carry out full and frequent stock rotation, ensuring you have a first in, first out policy, and how you will monitor and record this
- will check the temperatures of all the waste within the bay so that you carry out representative checks on the entire volume of the pile
- have taken into account the calculation of flame height and radiation in preventing the spread of fire between piles
- will prevent brands or lighted material moving outside the bay walls and igniting other wastes
- will keep clear a 'freeboard' space of 1m minimum at the top and sides of the walls at all times to prevent fire spreading over and around the walls
- will quickly and effectively remove wastes at risk of ignition to the quarantine area to isolate any bays with burning waste during an incident

Your response to question 15 in the Schedule 5 Notice issued on 9th December 2020 notes, in relation, to fire walls and bays that "the building design and construction has been in accordance with Building Regulations, as part of this work the building was inspected and approved by the Fire Brigade, operation has been approved by the insurers who look at fire risk".

This does not demonstrate that the fire walls and bays meet our requirements in section 11.2 of our guidance and you should justify and demonstrate compliance with each requirement of section 11.2 of our guidance in your response to this question.

The operator affirms that as the building has been designed in accordance with Building Regulations and construction has been through Building Control process of which the Fire Brigade is a consultee. The purpose behind the building regulations (set of standards for the design and construction) is to ensure that new buildings are going to be safe and meet the standards. This includes, but is not limited to; structural integrity, fire protection, accessibility, acoustic protection, and electrical safety. As the building has been approved as compliant with the Building Regulations and as the Fire Brigade came out and carried out an inspection of the premises and confirmed that they were happy, as the professionals in this area, the operator is satisfied that building is fit for purpose. This is further confirmed by the Tudor Griffiths Group Insurance Company who are also satisfied that the building has been constructed in accordance with Building Regulations and that the building is fit for the intended purpose.

12. (a) Confirm the scope and timescales for the proposed upgrade in fire detection and alarms within the MRF building.

The scope of the works is to the supply and install a fire detection system in accordance with the latest version of BS 5839 part 1 and Bafe SP203-1. Flame detection will be used within the main open area and smoke detection within the first-floor sorting area. An electronic sounder VAD beacons providing at least the minimum 65dB to all areas and visual alarms (due to the noisy environment).

The anticipated timescale for upgrade is 3 months.

(b) Demonstrate that the proposed upgrade in fire detection and alarms within the MRF building meet the requirements in Section 13 of our FPP guidance.

A quotation for the upgrade of the MRF fire detection system has been obtained and is currently awaiting authorisation. The quote has been provided by RMW Electrical Services Ltd who are accredited to British Approvals for Fire Equipment (BAFE), members of the Fire Protection Association (FPA) and Independent Fire Engineering & Distributors Association (IFEDA), amongst other accreditations.

(c) In the interim period before fire detection systems in the MRF building are upgraded, justify how site security visits or continuously monitored CCTV are capable of responding quickly and efficiently to an alarm sounding in the MRF building particular during periods the site would not be routinely attended by Tudor Griffiths staff.

The operator is looking to install the upgraded fire detection system, within 3 months if not sooner, which has been designed by RMW who are accredited to British Approvals for Fire Equipment (BAFE), members of the Fire Protection Association and Independent Fire Engineering & Distributors Association (IFEDA), amongst other accreditations.

Although the MRF building is not the direct subject of this permit variation application, EPR/CP3698VW/V004, the FPP submitted with this application is a consolidated FPP across all the operations on the Tudor Griffiths site. In addition, a fire in the MRF building has the potential to “cause or increase the impact of fire on a site” (including the biomass plant) as outlined in Section 3 of our FPP guidance. This question on the MRF building is asked as it can impact on fire control within the biomass operation.

Should a fire be detected in the biomass building, the alarm will also be activated automatically at the local Ellesmere fire brigade and the East Midlands Monitoring Service. Section 12.1.14 of your FPP states that “it is proposed” a similar system will operate for fires detected in the MRF building but that, at the moment, the alarm would sound which would be picked up on site security visits. We require confirmation on your proposals to upgrade the alarm system at the MRF building.

Your FPP states in Section 4.1.3 that the CCTV system is monitored continuously by East Midlands Monitoring Service and in Section 4.1.4 that there are three site security visits per night when visual checks are carried out including checks on whether doors are closed/locked. Further evidence is required to demonstrate that these security visits and monitoring of CCTV are capable of responding to an alarm sounding out of normal operating hours in the MRF building.

13. Confirm the timescales for installation and implementation of the proposed new ring main to go around the biomass building and provide water in the event of fire.

Section 12.1.6 of your FPP states "TG Enviro is also developing a ring main scheme to go around the Biomass building, Biomass outdoor storage area and MRF building (installed). This system will have fire hoses at key locations around the site and will provide access for the fire brigade to 50 000 litres of water". Confirmation is required on the timescale for implementing this system which will provide approximately 17% of the water requirements in the event of fire.

The 90mm ring main has been installed. The hydrants are currently being installed. The hydrants then need to be pressure tested to ensure adequate flow. The minimum pressure requirement is 3bar and the maximum pressure is 5bar. The maximum anticipated completion date is 1 month.

14. In relation to the polybooms which are proposed in the March 2021 revision of the FPP to retain fire water rather than the surface water lagoon proposed in previous versions of the FPP:

(a) Demonstrate that the quantity of water required to erect the polybooms will not compromise the water supply required for immediate fire-fighting on site.

The volume of water required to inflate the polybooms is approximately 15.62m³. This has been calculated using the following;

Diameter of polybooms 'tunnel' is 16cm

Each boom has 2 'tunnels'

Total length required according to Drawing Number TGE/33/A is approximately 372m. This includes the runs of 66m, 115m and 124m and a 1m overlap for the lengths greater than 100m to create a seal.

Volume of each tunnel is 2.011m³ per 100m

2 tunnels per 100m roll requires a volume of 4.02m³

372m therefore requires 14.95m³

The immediate supply of water available is 50m³ (50 000 litres), assuming no recharge then this would leave approximately 35m³ of water for fire fighting. However, the 50 000 litre tank operates on a float switch and so as soon as the water level drops within the tank the pumps respond and fill the tank back up.

(b) Confirm the number of people required to erect the polybooms, the total time required to erect all four polybooms and that sufficient people would be available for a fire event that might occur outside of normal site operating hours.

Ideally 2 people are required to erect the polybooms. The time taken to erect the polybooms is very much dependant on the fill rate and can be the slowest element, however, as there will be a minimum of 3 bar pressure in a 90mm ring main this means that at the hydrant the flow rate will be approximately 2.422m³/minute. Therefore, the total water filling time will be approximately 6.17 minutes.

The call out rota has a number of key staff to the operations of TG Group and include the Divisional Manager, Waste & Recycling Manager, Biomass Supervisor and three other staff members. These people can call upon additional staff members if required. The three additional staff members live in Ellesmere or the immediate surrounding area.

(c) Demonstrate there is sufficient lighting on site for safe and effective erection of the polybooms at night time.

Drawing TGE/35/A (copy attached) has been completed which shows the approximate locations of the security lights around the site. This drawing excludes those lights located above exits and doorways, which will provide a degree of local light to aid operations but are intended for highlighting entrances and exits from buildings. The drawing shows that there are 26 security lights around the site and the MRF building in addition has downward facing strip lighting around the exterior of the building, with 6 lights on the front and rear and 3 lights on the sides.

(d) Demonstrate that deployment of polybooms (rather than simply checking they are present on site) will be included in emergency exercises to test the operation of your FPP.

As it is recommended by the supplier that the polybooms are only used once then it is not proposed to discard 400m of polybooms after each exercise.

(e) Demonstrate that the polybooms are neither constructed of flammable materials which could burn in a fire before they could be erected nor stored in a location where a fire could prevent access to them.

The polybooms are constructed of low density polyethylene 500 gauge plastic. This allows them to be lightweight, flexible and with a good puncture resistance. These polybooms have been designed by fireman and are in use nationally by fire brigades, as well as industry. Please see link below.

[Trident Poly Land Boom \(darcy.co.uk\)](http://darcy.co.uk)

The proposed storage location of the polybooms is shown on Drawing TGE/33/A. This location is approximately 8.5m from the Biomass Building and 8m from the nearest stockpile (Grade A loose wood). Access to this area can be gained from the main yard, past the southern boundary of the Biomass Building or alternatively from the landfill and passed the MRF building. Therefore, the polybooms are located in area where fire would not prevent access.

(f) Demonstrate that connecting multiple lengths of polybooms can be carried out in a manner that creates an effective seal to prevent the escape of fire water.

A conversation with the suppliers has explained that although the polybooms cannot be connected, they can be overlapped (hence the 1m additions used in the volume calculation).

Please see email transcript of chat conversation attached to this response.

(g) Demonstrate that operational staff know which locations to erect polybooms and that these locations take into account site infrastructure to be protected (such as surface water drains).

Sections 14.1.4 and 14.1.5 of your FPP states that four 100 m rolls of polybooms will be used to retain any fire water on site. They would be installed in less than ten minutes each but require water to do so. Further information is required to demonstrate that they can be quickly and effectively deployed in an emergency situation and would not divert water resources away from fire-fighting in the early stages of a fire situation.

Please see trained toolbox talk on spillages (copy attached) which has a general spillage procedure as well as a specific one for fire water.

The surface water drains on the outdoor yard area drain to a sump and settlement pit prior to been pumped to surface water. This pump is kept on manual and so surface water discharge would not take place unless somebody actively switched it on.

Training will be delivered through a toolbox talk. Additionally, for those undertaking formal fire training, the use of the polybooms will form a part of this training.

15. In relation to your proposed stockpile sizes (FPP, Table 11) which do not comply with the maximum pile sizes outlined in our FPP guidance (section 9.2):

(a) Justify why your proposed stockpile sizes are appropriate in delivering the objectives of a FPP to:

- **minimise the likelihood of a fire happening;**
- **aim for a fire to be extinguished within 4 hours; and**
- **minimise the spread of fire within the site and to neighbouring sites.**

Table 11 of the FPP has been updated to reflect the volumes in the latest EA guidance document.

(b) Demonstrate what additional measures may be in place to manage the risk of fire from proposed stockpile sizes that are greater than those in our guidance.

The maximum pile sizes for wood wastes stored on your site are outlined in Table 11 of your FPP – for Grade A 10 mm fines/wood fines this is 583m³ and for Grade A animal bedding 40 mm chip this is 720m³. Section 9.2 of our guidance, maximum pile sizes, states that the maximum pile sizes for wood (<30 mm) is 300m³ and for wood (30 mm – 150 mm) is 450m³. Both these figures are less than the maximum pile sizes proposed in Table 11 of your FPP.

Table 11 of the FPP has been updated to reflect the volumes in the latest EA guidance document.

16. In relation to the import, storage and treatment of many different types of wood in many different areas on site:

(a) Demonstrate how site operations ensure only virgin wood and source segregated grade A waste wood are burned in the biomass boilers.

Wood is segregated on the main yard into different stockpiles of either Grade A loose wood or Grade B/C loose wood. Grade A loose wood comes directly from source segregated waste streams and Grade B/C wood comes from the MRF, although bulk loads can be accepted. The wood is inspected as per the waste acceptance procedures highlighted in the FPP (also in the Biomass EMS). Additionally, staff who work on the Biomass have been trained via a toolbox talk on the different grades of wood, with a copy available in the machines for reference. A copy has also been provided for the picking line in the MRF for reference of different types of wood. The wood collected from the MRF bays is mixed and is not segregated.

This training allows biomass staff to ensure that they know what Grade A wood looks like and through segregation of wood ensure that only Grade A wood waste is processed and dried for use in the Biomass boilers.

(b) Demonstrate that there is no potential route for other waste woods to be hand sorted or visually sorted from other wood imports to site into the stockpiles to fuel the biomass boilers.

There are a number of sections within the FPP that indicate Grade A waste wood (and virgin wood) as the sources of wood burned in the biomass boilers – for example, Section 5.2.1, “biomass plant boilers have a continual demand for Grade A wood waste or Outgoing Virgin Chip” or Section 5.4.2, “This allows the site to process waste stockpiles regularly utilising the shred in the biomass boilers on site (Grade A only)”.

The process schematic drawing, Biomass Processing Flow Chart, appears to indicate a route by which visual inspection of “Source segregated Grade A, Grade B/C wood, virgin timber (chip), non-waste materials” can result in wood being directed to a Grade A stockpile which can then be utilised as fuel for the biomass boilers.

You must demonstrate that there are robust systems in place to ensure only virgin wood or source-segregated Grade A waste wood are burned in the biomass boilers.

Please see answer to 16(a)

The Biomass Processing Flow Chart has been updated to further emphasise the segregation, separation and processing routes for Grade A, virgin timber (chip), non-waste materials and Grade B/C waste.

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